## NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

The PIA determines what kind of information in identifiable form (IIF), if any, is contained within a system, what is done with that information, and how that information is protected. Systems with IIF are subject to an extensive list of requirements based on privacy laws, regulations, and guidance.

# Identifying Numbers (Use N/A for items that are Not Applicable)

Application Name (generally the name that the system is accessed by. www.nasa.gov, when Web enabled, for example):	mediaservices.nasa.gov_(in the NASA Public Portal)					
Application Owner:	Patricia Dunnington , NASA CIO					
(Person who is responsible for funding)	Phone Number: (202) 358-1824					
System Manager:	Nitin Naik, NASA Associate CTO					
(Responsible for system technical operation)	Phone Number: (202) 358-1519 E-Mail: nitin.naik@nasa.gov					
NASA Cognizant Official for	Nitin Naik, NASA Associate CTO					
Content within this System:	Phone Number: (202) 358-1519 E-Mail: nitin.naik@nasa.gov					
(NASA individual responsible for maintaining content)	mediaservices.nasa.gov is the NASA Portal list server that delivers newsletters,					
Activity/Purpose of Application:	press releases and other communications to subscribed users through email.					
Mission Program/Project Supported:	All through the NASA Portal					
IT Security Plan Number:	NASA Public Portal Security Plan					
System Location (Center or contractor office building, room, city, and state):	Center/Contractor: Vericenter (sub-contractor to eTouch Systems Corp)  Street Address: 3431 N. Windsor Drive  Building: ST_CO ZIP 80011					
Privacy Act System of Records (SOR) Number:	N/A					
OMB Information Collection Approval Number and Expiration Date:	_ N/A					
Other Identifying Number(s):	N/A					

Na	Privacy Question Sets	F	Respons	e	Comments
No.	Trivacy Question Sets	Yes	No	N/A	Comments
	System Chara	cterizati	on and D	ota Cate	egorization
1	Has/Have any of the major changes listed in the Comments column occurred to the				☐ Conversions
	system since April 2003 or the conduct of				☐ Anonymous to Non-Anonymous
	the last PIA?				☐ Significant System Management Changes
					☐ Significant Merging
	If yes, please check which change(s) have occurred.				☐ New Public Access
	navo occarroa:				☐ Commercial Sources
					☐ Internal Flow or Collection
					☐ New Interagency Use
					☐ Alteration in Character of Data
2	Does/Will the system contain Federal records?		×		
3	If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules or the General Records Schedules are/will the records be retained and disposed of or archived?				Schedule Item:
4	Do the records in the system pertain to active programs/projects?				
5	Are the records Vital records for the organization?				
6	Are backup files (tapes or other media) being stored off-site?  If yes, please indicate in the comment field where backups are located.	⊠			Backup storage location : Vericenter secure fireproof tape archives and secure remote repository

N.	Privacy Question Sets	ı	Response		O
No.	•	Yes	No	N/A	Comments
7	Does/Will the system contain (store) information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system?  Note: If yes, check all that apply in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.  Please note: This question seeks to identify all personal information contained within the system. This includes any IIF, whether or not it is subject to the <i>Privacy Act</i> , whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the <i>Privacy Act</i> or other legislation.	⊠.			Personal Information:  Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or records Foreign activities and/or interests Other:
8	Indicate all the categories of individuals about whom IIF is or will be stored.				⊠ Employees     □ Public citizens     □ Patients     □ Business partners/contacts (federal, state, local agencies)     □ Vendors/Suppliers/Contractors

Na	Privacy Question Sets	F	Respons	e	Comments
No.		Yes	No	N/A	Comments
	System Chara	cterizati	on and D	Data Cate	egorization
9	Are records on the system (or will records on the system be) retrieved by one or more data elements?  Note: If yes, specify in the Comments column data elements will be used in retrieving the records (i.e., using a record number, name, social security number, or other data element or record locator methodology). If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information:  Name Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or interests Other:
10	Are/Will records on 10 or more individuals containing IIF [be] maintained, stored or transmitted/passed through this system?	$\boxtimes$			
11	Is the system (or will it be) subject to the <i>Privacy Act</i> ?  Note: If the answer to questions 7, 9, and 10 were yes, the system will likely be subject to the <i>Privacy Act</i> . System owners should contact their Center PAM for assistance with this question if they are uncertain of the applicability of the <i>Privacy Act</i> .		⊠		
12	Has a <i>Privacy Act</i> System of Record (SOR) Notice been published in the Federal Register for this system?  Note: If no, explain why not in the Comments column.		⊠		No IIF is contained in the system.      IIF is in the system, but records are not retrieved by IIF.      Should have published an SOR, but was unaware of the requirement.      System is required to have an SOR but is not yet procured or operational.      Other:
13	If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?				
	Infor	mation	Sharing	Practice	s
14	Is the IIF in the system voluntarily submitted (or will it be)?				

No	Privacy Question Sets	F	Response		Comments
No.	i iiiday adastion ooto	Yes	No	N/A	Comments
15	Does/Will the system collect IIF directly from individuals?  Note: If yes, identify in the Comments column the IIF the system collects or will collect directly from individuals. If the category of personal information is not listed, please check "Other" and identify the category.				
16	Does/Will the system collect IIF from other resources (i.e., databases, Web sites, etc.)?  Note: If yes, specify the resource(s) and IIF in the Comments column.				
17	Does/Will the system populate data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)?  Note: If yes, specify resource(s) and purpose for each instance in the Comments column.				Resource: www.nasa.gov Resource: Resource: Resource: Resource: Resource:
18	Does/Will the system share or disclose IIF with agencies external to NASA, or other people or organizations outside NASA?  Note: If yes, specify with whom and for what purposes, and identify which data elements in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				With whom and for what purposes:

	Privacy Question Sets	ı	Respons	se	
No.	Filvacy Question Sets	Yes	No	N/A	Comments
19	If the IIF in the system is or will be matched against IIF in one or more other computer systems internal or external to NASA, are (or will there be) computer data matching agreement(s) in place?  If yes, indicate in the Comments column internal or external and the system(s) with data which are matched.				Location of other systems involved in matching:  Internal NASA External to NASA  Other systems involved:
20	If data matching activities will occur, will the IIF be de-identified, aggregated, or otherwise made anonymous?  Note: If yes, please describe this use in the Comments column.				☐ De-identified ☐ Aggregated ☐ Other
21	Is there a process, either planned or in place, to notify organizations or systems that are dependent upon the IIF contained in this system when changes occur (i.e., revisions to IIF, when the system encounters a major change, or is replaced)?				
22	Is there a process, either planned or in place, to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection)?				
23	Is there/Will there be a process in place for individuals to choose how their IIF data is used?  Note: If yes, please describe the process for allowing individuals choice in the Comments column.				Process: IIF includes only email addresses. Individuals will be notified by email of any major system changes.
24	Is there/Will there be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate?  Note: If yes, please describe briefly the notification process in the Comments column.	×			Process: Individuals are provided with contact information for email.
25	Are there or will there be processes in place for periodic reviews of IIF contained in the system to ensure the data's integrity, availability, accuracy, and relevancy?  Note: If yes, please describe briefly the review process in the Comments column.				Process: System security is monitored on 24 x 7 basis, periodic security probe tests are conducted, and system alert notification.

Na	Privacy Question Sets	ı	Response		0
No.	,	Yes	No	N/A	Comments
26	Are there/Will there be rules of conduct in place for access to IIF on the system?  Note: If yes, identify in the Comments column all users with access to IIF on the system and for what purposes they use the IIF.				☐ Users ☐ Administrators ☐ Developers ☐ Contractors  For what purposes: ☐ user may subscribe and unsubscribe ☐ Duplicate and copy prevention ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
27	Is there a process in place to log routine and non-routine disclosures and/or unauthorized access?  If yes, check in the Comments column which kind of disclosures are logged.				Disclosures logged:  ☐ Routine ☑ Non-routine ☑ Public Internet Intrusion detection
	Web:	site Hos	st – Que	stion Se	ts
28	Note:  If yes, identify what type of site the system hosts in the Comments column.  If no, check "No" for all remaining questions in the "Web Site Host Question Sets" section and answer questions starting with the "Administrative Controls" section beginning with question 42.		⊠		Type of site:  Public Internet  Internal NASA  Both
29	Is the Web site (or will it be) accessible by the public or other entities (i.e., federal, state, and local agencies, contractors, third-party administrators, etc.)?			×	
30	Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?				
31	Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?  Note: If no, please describe in the Comments column your timeline to implement P3P requirements for this system.				Implementation Plan:

	Privacy Quarties Sate	ı	Respons	se	
No.	Privacy Question Sets	Yes	No	N/A	Comments
32	Does the Web site employ (or will it employ) persistent tracking technologies?  Note: If yes, identify types of cookies in the Comments column. If persistent tracking technologies are in place, please indicate the official who authorized the use of the persistent tracking technology.			⊠	☐ Session Cookies ☐ Persistent Cookies ☐ Web bugs ☐ Web beacons ☐ Other (Describe):  Authorizing Official:  Authorizing Date:
33	Does/Will the Web site collect or maintain personal information from or about children under the age of 13?				
34	If the Web site does/will collect or maintain personal information from or about children under the age of 13, please indicate what information and how the information is collected.			×	☐ Actively directly from the child ☐ Passively through cookies ☐ Both of the above What Information collected: ————————————————————————————————————
35	If the Web site does/will collect or maintain personal information from or about children under the age of 13, is the information shared with any non-NASA organizations, grantees, universities, etc.  Note: If yes, also identify the non-NASA organizations in the comments field				Information is shared with:
36	If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify in the comments field what method is used for obtaining parental consent.			⊠	Method used for obtaining parental consent (please check all that apply)  No consent is obtained Simple email email accompanied by digital signature signed form from the parent via postal mail or facsimile accepting and verifying a credit card number in connection with a transaction taking calls from parents, through a toll-free telephone number staffed by trained personnel

No.	Privacy Question Sets	F	Respons		Comments	
	<b>D D D D D D D D D D</b>	Yes	No	N/A		
37	Does/Will the Web site collect IIF electronically from any individuals?  Note: If yes, identify what IIF the system collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information:  Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Foreign activities and/or interests Other:	
38	Does/Will the Web site provide a PDF form to be completed with IIF from any individuals and then mailed or otherwise provided to NASA?  Note: If yes, identify what IIF the PDF form collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information:  Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or interests Other:	

	Privacy Question Sets	Response		ie	
No.	as, quodion oots	Yes	No	N/A	Comments
39	Does/Will the Web site <i>share</i> IIF with organizations external to NASA, or other people or organizations outside NASA?  Note: If yes, specify with whom and for what purposes.				With whom and for what purposes:
40	Are rules of conduct in place (or will they be in place) for access to IIF on the Web site?  Note: If yes, identify in the Comments column all categories of users with access to IIF on the system, and for what purposes the IIF is used.				☐ Users ☐ Administrators ☐ Developers ☐ Contractors  For what purposes: ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
41	Does (or will) the Web site contain links to sites external to the Center that owns and/or operates the system?  Note: If yes, note in the Comments column whether the system provides a disclaimer notice for users that follow external links to Web sites not owned or operated by the Center.			⊠	☐ Disclaimer notice for all external links
		dminist	rative Co	ontrols	
42	Have there been major changes to the system since it was last certified and accredited?  Note: If the system is under development and not yet certified and accredited at the time of this PIA, please describe in the Comments column the plan and timeline for conducting a certification and accreditation (C&A) for this system.				
43	Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been (or will they be) trained and made aware of their responsibilities for protecting the IIF being collected and maintained?				
44	Who has /will have access to the IIF on the system?  Note: Check all that apply in the Comments column.				<ul> <li>☑ Users</li> <li>☑ Administrators</li> <li>☑ Developers</li> <li>☑ Contractors</li> <li>☐ Other</li> </ul>

	Privacy Question Sets		Respons	se	
No.		Yes	No	N/A	Comments
45	If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?				
46	Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties?  Note: If yes, please specify method(s) in the Comments column.				
47	Are there policies or guidelines in place for the retention and destruction of IIF within the application/system?  Note: If yes, please provide some detail about these policies/practices in the Comments column.				Information is retained for the shorter of the time required to complete the action requested by the provider.
		Techni	cal Con	trols	
48	Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system (or will there be)?				
49	Are any of the password controls listed in the Comments column in place (or will they be)?  Note: Check all that apply in the Comments column.				<ul> <li>☑ Passwords expire after a set period of time.</li> <li>☑ Accounts are locked after a set period of inactivity.</li> <li>☑ Minimum length of passwords is eight characters.</li> <li>☑ Passwords must be a combination of uppercase, lowercase, and special characters.</li> <li>☑ Accounts are locked after a set number of incorrect attempts.</li> </ul>
50	Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?				
		Physic	al Cont	rols	
51	Are physical access controls in place (or will they be)				
		-	END -		

# PIA Analysis Worksheet Contact Information

Signature of NASA Cognizant Official	Date
for Technical Operation of this System	

Nitin Naik
NASA Associate CTO
NASA Office of the CIO
NASA Headquarters
Washington, DC 20546-0001
202/358-1519
public-inquiries@hq.nasa.gov

# **Privacy Impact Assessment (PIA) Summary**

Date of this Submission: (12/09/2005)

NASA Center: Headquarters, NASA Office of the CIO

Application Name: http://mediaservices.nasa.gov/ (the NASA Portal)

Is this application or information collection new or is an existing one being modified? No

Does this application collect, maintain, and/or disseminate information in identifiable

form (IIF)? Yes

Mission Program/Project Supported: All, through the NASA Office of the CIO.

Identifying Numbers (Use N/A, where appropriate)

Privacy Act System of Records Number: N/A

OMB Information Collection Approval Number and Expiration Date: N/A

Other Identifying Number(s): N/A

# **Description**

1. Provide an overview of the application or collection and indicate the legislation authorizing this activity.

mediaservices.nasa.gov is NASA's public list server. It provides email delivery of newsletters, press releases, and other information subscribed to by users of the NASA Portal, a secure system provided to allow web publication of NASA's public content to a broad public audience. mediaservices.nasa.gov interacts with users as any typical list server. It is an mx record that provides the source for email delivery. It allows voluntary user subscription and un-subscription though the subscribers resident email program.

 Describe the information the agency will collect, maintain, or disseminate and how the agency will use the information. In this description, indicate whether the information contains IIF and whether submission is voluntary or mandatory.

The subscriber submits all information voluntarily. Subscription to particular newsletters is determined by where the user is provided a link to subscribe (any NASA Web Site). The subscribers email address and the particular communication they are subscribing to are passed to the system by the subscribers resident email program. The system records the email address and newsletter subscription in a database. This information is then used to send the latest version of the newsletter to email address submitted. This IIF is not disseminated to any other location or system.

3. Explain how the IIF collected, maintained, and/or disseminated is the minimum necessary to accomplish the purpose for this effort.

The information collected and stored by mediaservices.nasa.gov will be used only for its intended purpose as described above. Information collected is the minimum required to accomplish the user's voluntary request for subscription to the newsletter.

NASA PIA Summary Page 1

4. Explain why the IIF is being collected, maintained, or disseminated.

Email addresses are required to deliver the communication requested by the subscriber. The email is maintained so that every time there is a new issue of the newsletter the user can have a copy emailed to him/her. The system needs the email address to automatically send the new issue as soon as it is submitted to the system by the authors for dissemination.

5. Identify with whom the agency will share the IIF.

The agency does not share this information with anyone other then NASA, its agents, or as otherwise required by law. Information is accessible only by the system administrators as required for them to perform their day to day jobs. Subscribers can un-subscribe at any time they choose.

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g., written notice, electronic notice if a Web-based collection, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared.

Information is provided by the user on a voluntary basis through a subscribe/un-subscribe process through the subscribers email program. Email is the only way the subscriber can interact with the system. Links to the privacy policy are provided in a statement on the web page where the subscription information is collected. Users are not required to submit this information to browse <a href="http://www.nasa.gov/">http://www.nasa.gov/</a> but are required to submit it if they wish to receive updates in the form of newsletters.

7. State whether personal information will be collected from children under age 13 on the Internet and, if so, how parental or guardian approval will be obtained. (Reference: Children's Online Privacy Protection Act of 1998).

#### N/A

8. Describe how the IIF will be secured.

All email addresses are stored in systems protected by security provided for in a security plan that requires annual certification, frequent auditing and constant monitoring. Information is accessible only by the system administrators as required for them to perform their day to day jobs. IIF information protection is consistent with the principles the E-Government Act of 2002, and as applicable, the Freedom of Information Act.

Describe plans for retention and destruction of IIF.

Email addresses are retained for a period of time that the subscribed to communication is published. Where information is maintained for backup purposes on magnetic tapes, these tapes are overwritten, erased, or destroyed within 120 days.

NASA PIA Summary Page 2

10. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the *Privacy Act*), or identify the existing Privacy Act system of records notice under which the records will be maintained.

## N/A

Identify a point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it:

Nitin Naik NASA Associate CTO NASA Office of the CIO NASA Headquarters Washington, DC 20546-0001 202/358-1519 public-inquiries@hq.nasa.gov

Submitted by: (Signature on Record)
Nitin Naik
NASA Associate CTO
NASA Office of the Chief Information Officer
NASA Headquarters
Washington, DC 20546-0001
202/358-1519
12/15/2005

Concur:	Concur:	
Patti F. Stockman	Scott Santiago	
NASA Privacy Act Officer	Deputy CIO for IT Security	
Date	Date:	
Approved for Publication:		
Patricia L. Dunnington		
Chief Information Officer		
Date		

NASA PIA Summary Page 3